

CR 1

119

SCANLON, M.J.

SD:LHE  
F. #2015R00171

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

- - - - -X

UNITED STATES OF AMERICA

I N D I C T M E N T

- against -

JOSEPH CHARLES,  
also known as "City,"

Defendant.

Cr. No. \_\_\_\_\_  
(T. 21, U.S.C., §§ 853(a), 853(p), 959(a),  
959(c), 960(b)(2)(B)(ii), 963; T. 18, U.S.C.,  
§§ 3238 and 3551 et seq.)

- - - - -X

THE GRAND JURY CHARGES:

COUNT ONE

(International Cocaine Distribution Conspiracy)

1. On or about and between September 3, 2014 and October 2, 2014, both dates being approximate and inclusive, within the extraterritorial jurisdiction of the United States, the defendant, JOSEPH CHARLES, also known as "City," together with others, did knowingly and intentionally conspire to distribute a controlled substance, which offense involved a substance containing cocaine, a Schedule II controlled substance, intending and knowing that such substance would be unlawfully imported into the United States from a place outside thereof, contrary to Title 21, United States Code, Sections 959(a) and 960(a)(3). The amount of cocaine involved in the conspiracy attributable to the defendant as a result of his

FILED  
CLERK  
2015 MAR 17 PM 3:23  
U.S. DISTRICT COURT  
EASTERN DISTRICT  
OF NEW YORK

own conduct and the conduct of other conspirators reasonably foreseeable to him, was at least 500 grams or more of a substance containing cocaine.

(Title 21, United States Code, Sections 959(c), 960(b)(2)(B)(ii) and 963; Title 18, United States Code, Sections 3238 and 3551 et seq.)

**COUNT TWO**  
(International Cocaine Distribution)

2. On or about September 4, 2014, within the extraterritorial jurisdiction of the United States, the defendant, JOSEPH CHARLES, also known as “City,” together with others, did knowingly and intentionally distribute a controlled substance, which offense involved a substance containing cocaine, a Schedule II controlled substance, intending and knowing that such substance would be unlawfully imported into the United States from a place outside thereof, contrary to Title 21, United States Code, Sections 959(a) and 960(a)(3). The amount of cocaine involved in the offense was at least 500 grams or more of a substance containing cocaine.

(Title 21, United States Code, Sections 959(a) and 960(b)(2)(B)(ii); Title 18, United States Code, Sections 3238 and 3551 et seq.)

CRIMINAL FORFEITURE ALLEGATION

3. The United States hereby gives notice to the defendant that, upon his conviction of the offenses charged herein, the government will seek forfeiture in accordance with Title 21, United States Code, Section 853(a), which requires any person convicted of such offenses to forfeit any property constituting, or derived from, proceeds obtained, directly or indirectly, as the result of such offenses, and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, such offenses.

4. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:


- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to

seek forfeiture of any other property of the defendant up to the value of the forfeitable property described in this forfeiture allegation.

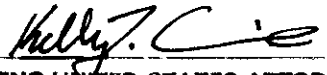
(Title 21, United States Code, Sections 853(a) and 853(p))

A TRUE BILL

  
\_\_\_\_\_  
FOREPERSON

\_\_\_\_\_  
LORETTA E. LYNCH  
UNITED STATES ATTORNEY  
EASTERN DISTRICT OF NEW YORK

BY:

  
\_\_\_\_\_  
ACTING UNITED STATES ATTORNEY  
PURSUANT TO 28 C.F.R. § 0.136

F #2015R00171  
FORM DBD-34  
JUN. 85

No.

**UNITED STATES DISTRICT COURT**

*EASTERN District of NEW YORK*

**CRIMINAL DIVISION**

**THE UNITED STATES OF AMERICA**

vs.

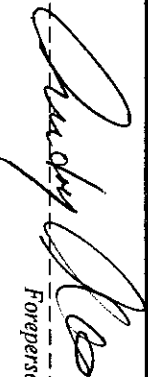
**JOSEPH CHARLES,**

Defendant.

**INDICTMENT**

(T. T. 21, U.S.C., §§ 853(a), 853(p), 959(a), 959(c), 960(b)(2)(B)(ii),  
963; T. 18, U.S.C., §§ 3238 and 3551 et seq.)

*A true bill.*



Foreperson

Filed in open court this \_\_\_\_\_ day,  
of \_\_\_\_\_ A.D. 20 \_\_\_\_\_

Clerk

Bail, \$ \_\_\_\_\_

*Lauren Howard Elbert, Assistant U.S. Attorney (718) 254-7577*